

Bere Regis & District Swimming Club

Data Protection Policy

1. The club pays due attention to personal data protection in order to comply with the Data Protection Act (DPA) 1998 and more recently the General Data Protection Regulation (GDPR) in force from 25 May 2018. This policy will ensure that the club is fully compliant with both.

2. The personal information held by the club is required by law to be:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights of access, privacy and withdrawal
- kept safe and secure
- not transferred outside of the UK without adequate protection.

3. The club holds members and volunteers' personal information to enable smooth running of all aspects of the club, ie progress monitoring, attendance, emergency contact details, communication and notices of forthcoming events. Data is held under the control of the club committee (the Data Controller) and processed by the club Registration Officer, members of the club committee, members of the club teaching team, Swim England, Swimming Teachers Association and the Disclosure and Barring Service.

For members, data processed by the club is:

- in the first instance, provided in hard copy as a set of registration forms completed by the member, or their parent/guardian, provided to the club Registration Officer. The form comprises name, address, telephone number, email address, medical conditions and ethnicity of club members. It also contains the name and telephone number of a person to be contacted in emergency for each member. It also includes the email address for communications to be sent to. Information from this form, is entered by the club Registration Officer into the Swim England database to ensure registration, membership, insurance and compliance with standards is maintained. This information is processed by Swim England in accordance with their privacy notice and data protection policy (available on their website)
- to be kept up to date by individual club member's liaison with the Registration Officer
- controlled by select club committee members to distribute information to club members, or their parent/guardian from time to time
- in relation to individual paper registration forms, destroyed once entered into the Swim England database, with the exception of relevant ongoing medical conditions which will (with parent/guardian's consent) be transferred to a medical file that is kept securely and only accessed by necessary teachers
- swimming session group records kept in electronic form and paper form by way of a member master list and individual group lists, which contains names and records of attendance and progress relating to the STA standards which leads to badge/certificate achievement. This information is controlled and kept securely by

members of the teaching team and the club Registration Officer and contains no sensitive information other than identifying name/initials of members

- data in the lists will be cleansed regularly and member information will be destroyed/deleted from records when the club is notified that an individual's membership has ceased
- the email communication list will be cleansed on a regular basis and email addresses will be removed when the club is notified that an individual's membership has ceased
- members' names will remain on trophies and results lists after an individual's membership has ceased

For volunteers, data processed by the club is:

- processed as per members, for registration on the Swim England database
- name, contact email address and date of birth provided to the club's Welfare Officer who enters the information onto the DBS website, the DBS contact the individual to request further information in line with their privacy notice and data protection policy (available on their website)
- individuals are required to produce their DBS certificate for inspection by the club's Welfare Officer, no copies of the form are held by the club, the Welfare Officer receives a letter of confirmation of DBS check received
- destroyed after 6 years following the individual's period of volunteering has ceased, with the exception if any concerns are raised during the period of volunteering about the individual's behaviour around children, in which case information should be kept until the reach National Retirement Age, or for 10 years, whichever is longer

For all, relating to health and safety data processed by the club is:

- 'the accident book' is maintained on poolside in hard copy in the event of an incident connected to the undertaking of club activities. The records are kept securely and maintained by an appropriately trained first aider, information may be given verbally to a medical professional in exceptional circumstances, ie if care of member/volunteer is handed over to a paramedic
- destroyed after 3 years from the date of the last entry in the accident book

For all, relating to safeguarding, data processed by the club is:

- held securely by the Welfare Officer in relation to ongoing investigations
- destroyed after 7 years after the date of the last contact with the child

Other than where highlighted above, in all circumstances, data will not be given to anyone outside the club without the individual's approval, other than where the club has a legal obligation to disclose the information (such as responding to a court order), to protect Bere Regis & District Swimming Club's legal rights or to prevent fraud or illegal activity.

4. The club also holds the personal information of anyone seeking attendance of the club or individual club members at events or requesting other information of the club. This is obtained via email or verbally by direct enquiry to a member of the club committee. Enquiries are:

- to be forwarded to the club Chairman/head of the teaching team for consideration
- to be destroyed if no longer dealing with the enquiry or once the individual has completed the registration forms to become a member

5. It is a member's (or their parent/guardian's) responsibility to inform the club of any change of information, and when their membership has ceased.

6. The club tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention in the first instance if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you wish to make a complaint about the way we have processed your personal information, you have the right to lodge a complaint with the Information Commissioner's Office (the statutory body which oversees data protection law in the UK), via their website <https://ico.org.uk/make-a-complaint/>.

7. This data protection policy does not provide exhaustive detail in examples of data collection and use of personal information. However, we are happy to accommodate your right to make a 'subject access request' if you wish to find out what personal information we hold about you, please put a request in writing to the address below.

Bob Holman
Chairman, on behalf of the Bere Regis & District Swimming Club Committee

Bere Regis & District Swimming Club, c/o Purbeck Sports Centre, Worgret Road, Wareham,
Dorset BH20 4PH
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This Data Protection Policy was created in May 2018 and will be reviewed by the club committee on an annual basis and updated if necessary. The club website will display the latest version.